

EXHIBIT 11

From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Sunday, October 20, 2019 5:48 PM
To: Prather, Laura
Cc: Ty Clevenger
Subject: Discovery Issues and Pro Hac
Attachments: Application to Appear Pro Hac Vice - As Emailed.pdf; Court - 11.20.18.pdf

Laura,

I have been extraordinarily busy since August with multiple hearings and trials in several high-profile cases. I apologize for not being more attentive to your requests for information.

Three things:

1. In response to your letter concerning Plaintiff's discovery responses, Plaintiff will provide supplemental discovery responses no later than Wednesday, October 23, 2019.
2. In spite of several efforts, I was unable to retrieve the files from the hard-drive provided by Mr. Butowsky. Accordingly, I have asked him to upload all documents and files to a flashdrive, and fedex me the documents. I will produce the documents via HighTail on 10/23.
3. Pursuant to the Court's procedures and the Clerk's instructions, I emailed the pro hac application to the Clerk and received an email from the Clerk in response. The Clerk created Docket Entry 33, not me. My application included an attachment. That attachment is expressly identified in the application. You could have been obtained a copy of the attachment from the Court at any time. I am not sure why you are asking for it now, but I attach copies of what I emailed to the Clerk and the Clerk's email to me dated November 20, 2018. I redacted the CM''/ECF filing password. Please let me know if you have any further questions about the pro hac application.

Finally, I would like to schedule the depositions of David Folkenflik and NPR. Please provide your available dates in November and December. I also plan to depose Fox and Malia Zimmerman, so we may as well go ahead and schedule those depositions as well. Please provide your dates asap, so I can lock in dates on my calendar. Thank you.

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